



TENNESSEE REGULATORY AUTHORITY

Deborah Taylor Tate, Director

TO: TRA Directors
Interested Participants

FROM: Deborah Taylor Tate *DAT*

RE: Generic Gas Docket 05-00046

DATE: May 20, 2005

Numerous filings have been made and reviewed—I was impressed by the depth and the breadth of issues and the information provided and would like to suggest an implementation plan. The subject matter and issues suggested generally fall into 3 major categories: (1) Process and Procedural, (2) Substantive, and (3) Consumer Issues.

(1) Procedural/process issues:

I would propose that we conduct a meeting, discussion, or workshop in which we review any additional comments from the parties, and have very short oral presentations (5-10 minutes) if desired; with an opportunity for staff questions and comments as well. This procedural workshop would include issues such as (1) Minimum filing guidelines, (2) PGA 30 day filing requirements, (3) Submission of Proposed orders (timeliness), (4) TRA staff rule 1220-1-2-.21, and (5) Sufficiency of present confidentiality safeguards (Open Records Act).

I would envision that following the workshop on procedure, all parties would have an opportunity for any additional written comments or answers to questions which may arise.

I would recommend that within 30 days, (by Monday June 13, 2005) the General Counsel will set this date (possibly sometime in July) and if parties request the opportunity to file additional comments, then we might place this docket on a TRA regular Conference at the end of another 60 days to take any necessary action. This procedural workshop could conclude by mid-September. It would be premature to suggest any specific action, however, further dockets may be recommended after the workshop.

Secondly, I would like to propose that we have a series of Forums on substantive issues. The first of these Forums will involve the topic of Asset Management in July or August as TRA schedules permit. By this correspondence, I am requesting your suggestions and contact information for knowledgeable presenters. As I mentioned, this Forum should operate concurrently with the procedural workshop.

Again, questions may require additional response times and if there are specific amendments to our rules, then a rulemaking docket could be opened. Or, this may be purely educational in order that we continually update ourselves and our staff on what is occurring in the industry, nationally and regionally, and how that may impact Tennessee consumers.

Finally, there were a number of issues which are broadly consumer-focused. Both Eddie Roberson, Chief of Consumer Services and External Affairs, and Glynn Blanton, Chief of Gas Pipeline Safety, have agreed to organize these issues including (1) Service quality (Service Standards), (2) Safety (Bare steel replacement plans, new technologies such as excess flow valves, etc), (3) Updated information regarding low-income assistance, LIHEAP, consumer payment plans, (4) Research and development, and (5) Conservation and educational efforts.

There will undoubtedly be substantive issues which may arise and hopefully will be part of an ongoing dialogue between this Agency and the industry. I know all the Directors share the goal of improving our efficiency as an agency and, as appropriate, streamlining the regulatory processes for businesses which operate in Tennessee. Monitoring other commission actions and implementing mechanisms which allow companies to continue to invest in Tennessee should be balanced with our legal mandate to continue to protect and insure the safe, reliable and cost effective services to our consumers.

DTT:met